

Document Page 1 of 2  
UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

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Attorney for the Debtor(s)

By: Justin M. Gillman, Esq.

In Re:

Jovanny Valdez

Case No.: 19-16636-MBK

Judge: Kaplan

Chapter: 13

**CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION**

The debtor in this case opposes the following (**choose one**):

1. ☒ Motion for Relief from the Automatic Stay filed by Fay Servicing,  
creditor,

A hearing has been scheduled for June 28, 2023, at 9:00 AM.

- ☐ Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for \_\_\_\_\_, at \_\_\_\_\_.

- ☐ Certification of Default filed by \_\_\_\_\_,

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons (**choose one**):

☒ Payments have been made in the amount of \$ 9,180.00, but have not  
been accounted for. Documentation in support is attached.

☒ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

This is a multi-family rental property and Debtor had issues in past with tenants not paying rent in a timely fashion. Delinquency arose in late 2022 and early 2023 and Debtor has been making regular payments plus additional amounts on a monthly basis since that time.

☒ Other (**explain your answer**):

Debtor can continue to make payments and cure remaining arrears in a reasonable time or through Chapter 13 Plan.

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: 6/21/2023

/s/ Jovanny Valdez  
Debtor's Signature

Date: \_\_\_\_\_

\_\_\_\_\_  
Debtor's Signature

**NOTES:**

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.